



NC-SARA, SARA, and SAN: The Power of Collaboration

[The National Council for State Authorization Reciprocity Agreements \(NC-SARA\)](#) and the [State Authorization Network \(SAN\)](#) are two national, nonprofit organizations established to improve the quality, accessibility, and reach of postsecondary education opportunities for learners across the nation. The two organizations achieve this by providing leadership, guidance, and support as we work closely with states, higher education institutions, policymakers, and other organizations participating in various aspects of distance learning.

It's not uncommon for SAN staff or NC-SARA staff to be asked about the relationship between the two organizations, where they overlap, what is unique to each, the value they bring, and how they work together and support one another. We will touch on those topics below but defining State Authorization Reciprocity Agreements (SARA) is an important preliminary step.

The terms *SARA* and *NC-SARA* are often used interchangeably but are in fact not the same. *SARA* is an *agreement*, and *NC-SARA* is an *organization*. *NC-SARA* coordinates the implementation of *SARA* with the regional education compacts.

SARA: is an agreement amongst member states, districts, and territories that establishes comparable national standards and streamlines regulations, fees, and approvals for institutions offering interstate distance education programs.

- 49 member states, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands all voluntarily joined SARA, and apply for renewal of their membership every two years.
- More than 2,400 institutions, all accredited by agencies recognized by the U.S. Department of Education, participate in SARA. They apply for renewal of SARA participation each year.

The four regional education compacts are: **MHEC** - the Midwestern Higher Education Compact, **NEBHE** - the New England Board of Higher Education, **SREB** - the Southern Regional Education Board, and **WICHE** - the Western Interstate Commission for Higher Education.

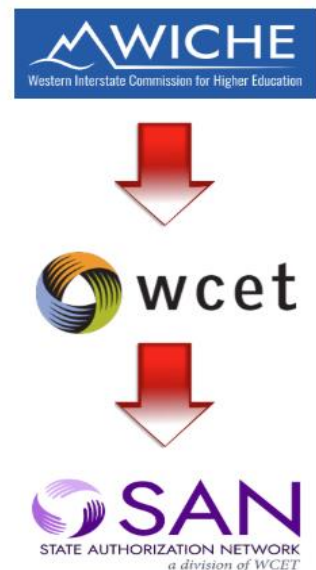
NC-SARA: is a private nonprofit [501(c)(3)] organization that, in partnership with the four [regional education compacts](#), coordinates the implementation of SARA nationally.

- NC-SARA helps states, institutions, policymakers, and students understand the purpose and benefits of participating in SARA.
- In addition, NC-SARA provides direct support to the regional education compacts, their [regional steering committees](#), the [State Portal Entities \(SPE\)](#), and [SARA-participating institutions](#).

SAN: was established to serve post-secondary institutions and organizations nationwide by providing training, support, and opportunities to collaborate while navigating regulatory compliance for out-of-state learning activities. SAN is a division of WCET, the WICHE Cooperative for Educational Technologies.

WCET: The [WICHE Cooperative for Educational Technologies](#) is the leader in the practice, policy, and advocacy of digital learning in higher education. WCET brings together colleges, universities, higher education organizations, and companies to collectively improve the quality and reach of digital learning programs. WCET is a unit of **WICHE**, the Western Interstate Commission for Higher Education.

WICHE: The [Western Interstate Commission for Higher Education](#) is a regional, nonprofit organization whose membership includes 15 western states as well as the U.S. Pacific Islands and freely associated states. WICHE and its member states and territories work to improve access to higher education and ensure student success.



While there is lots of foundational information to consider, it is also important to understand the early days of online learning at the postsecondary level.

Distance Education in the Early 2000s

The growth of online education in the early 2000s led to a patchwork of state regulations surrounding distance education offerings. Institutions found it challenging to navigate these requirements, which varied widely by state. To further complicate matters, in late 2010, the U.S. Department of Education released the first federal regulation for state authorization of distance education.

The purpose of the regulation was to provide important consumer protections for learners who participated in interstate distance education. Although the [original language of federal regulation 34 CFR 600.9\(c\)](#) was [eventually vacated by federal courts](#), it was the impetus for what is now the even more complicated and ever-evolving landscape of institutional compliance related to out-of-state postsecondary educational activity.

SAN and NC-SARA are Formed

Established in 2011 by WCET, SAN emerged to provide respite and to serve and support institutions/organizations in their quest to navigate the complex world of distance education compliance. SAN is now a vast network of more than 900 member institutions and organizations and remains a leader in authorization for distance education.

In December 2013, just a couple years after SAN was formed, NC-SARA was established to help support the regional education compacts in the implementation of the reciprocity agreements (SARA) across the nation. States began joining SARA in 2014, starting with Indiana. Valley City State University in North Dakota was the first institution to be approved for participation in SARA, joining in April 2014. By July 2019, 49 states and 3 territories were SARA members. As of 2024, SARA has over 2,400 participating institutions.

What are the Benefits of Participating in SARA?

Students benefit from increased access to distance education programs across state lines, and in many cases, improved consumer protections that they would not have if SARA did not exist. By encouraging strategic coordination and communication between and among SARA member states and providing a uniform set of [policies](#) for

According to the [SARA Cost Savings](#) study, a collaboration effort between NC-SARA and NCHEMS*, institutions save an average of \$69,000 per year by participating in SARA, freeing up resources that can then be allocated to other critical needs.

*National Center for Higher Education Management Systems

[student consumer protections](#) that otherwise would vary state-by-state, SARA streamlines state authorization processes for out-of-state institutions and helps reduce associated costs and bureaucracy for both states and institutions.

SARA's work includes:

- Advancing efforts to align core elements and requirements of SARA reciprocity across the SARA member states.
- Expanding consumer protections by facilitating state-led SARA policy changes.
- Ensuring effectiveness and continuous improvement of the collaborative partnership with the SARA community.

What are the Benefits of Participating in SAN?

SAN helps its members gain a better understanding of state and federal compliance requirements, fosters communication and collaboration, and provides educational and professional development opportunities to its members. SAN's participation in and contributions to the field of distance education compliance are vital. The organization takes very seriously its role in conducting and disseminating critical research, advocating on behalf of its members, and keeping institutions informed about changes at the state and federal levels that impact distance education and state authorization.

A major strength of SAN is its belief in the power of unity. The SAN organization exists to remind distance education compliance professionals that they are never alone. By staying connected with other institutions, SAN members can better navigate the ever-evolving authorization landscape, minimizing risks associated with non-compliance.

SAN is proud of its reputation as an organization that offers its members timely support, not only to SARA-participating institutions but also to institutions that, because they do not participate in SARA, are required to secure approval to offer distance education in other states through traditional state-by-state processes.

SAN (and WCET) are known nationally as staunch defenders of distance education. For example, Russ Poulin, Former Executive Director, WCET and Vice President for Technology-Enhanced Education for WICHE, was selected to be the negotiator representing the distance education community in the U.S. Department of Education's 2014 Negotiated Rulemaking process, and was also a member of the Distance Learning Subcommittee in the 2019 Negotiated Rulemaking process.

SAN tirelessly champions the interests of member institutions in discussions about state authorization policies and regulations, and when working with state and federal government to influence legislation and practices that affect online education. Additionally, SAN compliments institutional state approvals through reciprocity plans (such as SARA), as well as providing continual support to institutions that are required to garner state institutional approval through traditional individual state-by-state processes.

Our Impact in the Field

NC-SARA Highlights

NC-SARA collects, compiles, and shares SARA exclusively distance education enrollment data and out-of-state learning placement data that is [publicly available](#). SARA enrollment data from 2023 shows that over 1.6 million students attended out-of-state institutions exclusively via distance education through SARA in Fall 2023, and more than 430,000 students participated in out-of-state learning placements such as clinical rotations, student teaching, and internships that year. NC-SARA also collects, maintains, and publishes information regarding [SARA student complaints](#), and helps facilitate the [SARA Policy Modification Process](#) that puts states in control of SARA policy changes.

NC-SARA helps support its state members by convening an annual in-person SARA SPE conference as well as several virtual meetings each year for all 52 member states and territories to engage in discussion around SARA and related topics. NC-SARA offers grants of up to \$7,500 per year to SPE staff, providing funding for states to participate in critical professional development and host in-state convenings with their institutions. NC-SARA also provides the [SARA Learning Station](#) as a one-stop shop to access resources to learn about SARA.

To assist institutions that do not participate in SARA or wish to operate in a SARA member state beyond the scope of SARA, NC-SARA provides [The State Authorization Guide](#), a collection of state laws, regulations, and requirements covering activities that require authorization. The guide also includes application processes, costs to comply, and more, and is compiled from information submitted by state authorization regulatory agencies in each state, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands.

In addition, to help institutions as they seek to comply with federal professional licensure requirements, NC-SARA provides a [Professional Licensure Directory](#) with contact information for state professional licensure boards for counseling, nursing, psychology, social work, and teacher education programs, which are the programs with the highest enrollment based on data provided by SARA-participating institutions.

SAN Highlights

Since its inception in 2011, SAN has:

- Provided high-quality [SAN resources](#):
 - The network produces guides, toolkits, and other resources that assist institutions in understanding and implementing state approvals.
- Provided hundreds of in-person and virtual opportunities for training and support:
 - SAN offers in-house and campus-based training and workshop opportunities for institutional staff to be informed about changes in laws and regulations affecting distance education.
 - This includes both asynchronous and synchronous training in various formats, including workshops, monthly calls, and webcasts.
- Provided 13 years of policy influence:
 - SAN advocates for policies that support equitable access to education and streamlined regulations that benefit both institutions and students.
- Aided in facilitating student access:
 - By helping institutions navigate state regulations, SAN expands access to education for students across different states, enabling them to enroll in postsecondary programs without unnecessary barriers.

Both NC-SARA and SAN contribute to a more efficient and effective landscape for online education, benefitting institutions and students alike.

Common Goals of NC-SARA and SAN

NC-SARA and SAN, housed in adjacent buildings in Boulder, Colorado, have worked together for more than a decade, share common goals, and are regarded as trusted leaders in the field. Even more than their close physical proximity, both NC-SARA and SAN take pride in their roles as leaders.

[Marianne Boeke](#), president of NC-SARA shared, “WCET, SAN, NC-SARA staff, and the [SARA community](#) have worked closely together since the beginning. In the early days before there were SARA staff, SAN helped present what SARA was and how institutions could participate. WCET created the first resource for state-to-state authorization that eventually led to the State Higher Education Executive Officers Association (SHEEO) surveys in 2011, which are now maintained and housed by NC-SARA. SAN not only helps NC-SARA staff, but they also assist the regional education compacts, SPEs, and institutions. They attend SARA state meetings, regional steering committee meetings, and the SPE Annual Conference. WCET and SAN staff also continue to collaborate with NC-SARA staff on webinars. They can talk to any audience. They do it all.”

Boeke recently shared her hopes for the future: “We would appreciate SAN’s help revamping the State Authorization Guide and looking at our website from an outside perspective/institutional perspective to help us determine how to make it more user-friendly. We hope SAN staff will continue to present with us and keep us updated on higher education regulations that are adjacent to us, and we hope for their continued

partnership throughout the negotiated rulemaking process, including implementing new policy and navigating any challenges.”

[Cheryl Dowd](#), Senior Director with the SAN & WCET Policy Innovations, is proud of the ongoing relationship between the two organizations. She reminds us that NC-SARA and SAN have always been deeply entrenched and continue to work collaboratively.

As an example, prior to [NC-SARA obtaining its 501\(c\)3 status](#) in 2015, NC-SARA was financially managed by SAN’s parent organization, WICHE. Dowd explains, “This interim arrangement facilitated the management of payments, payroll, and employee benefits while NC-SARA awaited the granting of its own 501(c)3 status. Initial funding for NC-SARA’s operations was secured through a grant from the Lumina Foundation.” Dowd also notes that SAN hosted NC-SARA webinars until 2018, when NC-SARA obtained their own webinar platform.

Dowd continues, “NC-SARA staff members and/or SARA Regional Directors present biannually at each SAN Workshop. What’s more, SAN staff regularly present on NC-SARA webinars, SARA meetings, and [Regional Steering Committees \(RSC\)](#) meetings.” She continues, “SAN and NC-SARA staff have collaborated on presentations at several national conferences, and SAN also participates in the SARA Policy Modification Process.”

[Russ Poulin](#), Former Executive Director of WCET and Vice President for Technology-Enhanced Education for WICHE, who has been around since the conceptualization phase of both NC-SARA and SAN, is also proud and supportive of the relationship and history between the two organizations: “It has been a great symbiotic relationship. SARA is part of the state consumer protections for students and also creates a path for institutions to operate in participating states. SAN addresses the multitude of issues that institutions face in a state that is not covered by SARA, such as professional licensure, federal regulations (Education, Defense, Veterans, Justice), and managing compliance activities. It is a positive partnership. Each working in their own lane, but working collaboratively, has helped all of higher education.”

Poulin continues, “SAN staff are often in contact with SARA leadership, whether at NC-SARA or the four regional higher education compacts. Through its institutions, SAN staff

“The benefits of NC-SARA and SAN are immeasurable. Together they represent more than 20 years of industry experience and expertise. Both organizations provide opportunities for learning, professional development, and collaboration that have an emphasis on emerging issues. Fortunately, members are in capable hands! Rest assured that the NC-SARA and SAN leadership teams continue to research, plan, and implement programs that will help professionals be ready for any changes that may come.”

~ Cam Maeyaert,
NASASPS

often learn of regulatory issues that its members or their students have in distance education that crosses state lines. SAN has been able to use that information to suggest improvements in SARA policies or procedures. WCET and SAN staff have served on several workgroups and have made numerous presentations for NC-SARA or regional compact events.”

Another Important Partner: NASASPS

Both SAN and NC-SARA have maintained ongoing collaborations and working relationships with the [National Association of State Administrators and Supervisors of Private Schools](#) (NASASPS) team. [Cathie \(Cam\) Maeyaert](#), Director of Private Postsecondary Institutions with the Texas Higher Education Coordinating Board, Vice President of the 2024-25 NASASPS Board of Directors, and NC-SARA Board Member, shared her thoughts on these partnerships:

Maeyaert recalls, “NASASPS and SAN have partnered for several years on the NASASPS annual conference that occurs in the Spring of each year. Cheryl Dowd has been a great resource in assisting NASASPS to develop topics that will be timely and helpful to institutions that are attending the conference. SAN has also provided speakers for general sessions at the conference. NASASPS values the deep knowledge that SAN and WCET staff bring to these sessions.”

She continues, “The partnership between NASASPS and SAN has resulted in NASASPS being able to connect with more institutions and allowing the NASASPS members to get to know the institutions and their personnel. The relationships built because of the synergy that NASASPS and SAN have created benefits for all, whether it is in formal conference sessions or the ability to ask and answer questions ‘off-line’ in a more relaxed, one-on-one setting.”

“NASASPS and NC-SARA have also worked together. Several years ago, we coordinated the NASASPS fall workshop and NC-SARA SPE conference to run back-to-back so that state regulators could combine travel. We hope to do this again in the future. NC-SARA staff have been invited to attend the NASASPS conference and present for several years. It is always valuable to have NC-SARA staff provide updates and explain any changes on the horizon. We appreciate the time NC-SARA staff has taken to join us to provide information.”

“NASASPS opened up its regular membership to SARA SPEs within the last two years. Feedback from several SPEs has indicated that attending NASASPS events allows them to learn more about state regulations that they may not get within their state, especially if the SPE is not part of the state higher education agency and therefore does

not have a lot of contact with their state colleagues. NASASPS is enriched by having these SPEs as regular members.”

Concluding Thoughts

SARA offers significant benefits to both institutions and students. It provides a more streamlined and consistent approach to state authorization, allowing institutions to expand their reach and students to access a broader range of programs while maintaining high standards of quality and accountability. Ultimately, SARA fosters a more accessible and efficient higher education landscape for distance education.

SAN provides institutions with an efficient, centralized way to navigate the complex landscape of state authorization, particularly for distance education programs. By offering streamlined processes, resources, real-time updates, and a platform for collaboration, SAN helps institutions save time, reduce costs, stay compliant with state regulations, and confidently offer students a broader range of educational opportunities.

Both NC-SARA and SAN are national leaders in distance education compliance. These organizations are widely recognized for their expertise and collaboration. As trusted neutral parties, NC-SARA and SAN will continue to work with stakeholders to address complex distance education compliance issues and deliver viable solutions.

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